EXHIBIT C

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

PROVIDENCE TITLE COMPANY	§	
Plaintiff,	§ §	
	§	Civil Action No. 4:21-cv-00147
V.	8	
	8	
TRULY TITLE, INC., TRACIE L.	§	
FLEMING, MARK J. FLEMING,	§	
KIM SHEETS-SHEFFIELD, AND	§	
GRAHAM HANKS	§	
	§	
Defendants.	§	
	§	

DECLARATION OF BRIANNA WOLTMANN

In accordance with 28 U.S.C. § 1746, Brianna Woltmann declares, under penalty of perjury, as follows:

- 1. I am Brianna Woltmann. I am over the age of twenty-one (21), of sound mind, and am competent to make this declaration. The information contained herein is within my personal knowledge.
- 2. I am a shareholder, member of the Board of Directors, and Executive Vice President for Providence Title Company ("Providence"), the plaintiff in the above-captioned lawsuit. From my role with Providence, I know that T. Fleming was the President, a shareholder, and a member of the Providence Board of Directors as of February 2, 2021.
- 3. I first learned about the departure of T. Fleming and M. Fleming from Providence after they submitted their resignations on February 3, 2021. Prior to that date, neither T. Fleming nor M. Fleming told me they were leaving Providence or suggested that they were joining Truly.

4. Ex. 1 to this Declaration is a true and correct copy of an email I sent to other Providence officers, directors, and employees on February 12, 2021. In this message, I provided a cut-and-paste of an email that a client contact shared with my husband Carlos, who then shared with me, that was originally sent from Kami Wilson-Nichols.

I have reviewed the foregoing declaration and hereby declare under penalty of perjury that the foregoing is true and correct and within my personal knowledge.

Executed on this 22 day of February, 2021 in Tarrant County, Texas.

Brianne J. Woltmann

EXHIBIT 1

From:

Brianne Woltmann

Sent:

Thursday, February 11, 2021 8:23 PM CST

To:

Advisory

Subject:

FW: Your Title Team has moved to Truly Title

If you are interested to see it, this is the message that they are sending out to clients about the move.

Personally, I love that they made an error in the following sentence: "Your title team are here and ready to assist."

Hi!

We have changed title companies. We are now with Truly Title! Your title team are here and ready to assist. Same team, just new company!

Kim is TRULY excited to show you our app and FREE farming tool!

I have also included some examples of the marketing materials that we have! You can also follow this link: <u>Truly Title</u> and see all of the options currently available! Or . .if you need something different, let me know! We can work to create materials to help YOU grow your business!

If there are any current orders or future orders that you want us to handle, please let us know. Our title turn time is 1-2 days so getting title back and the file ready won't be an issue.

We look forward to working with you again SOON! Let us know how we can help! Have a wonderful day!

Thank you!

Kami Wilson-Nichols | Escrow Officer | Truly Title, Inc. 550 Reserve Street Suites 106 & 231, Southlake, TX 76092 m: (972) 345-3065 | o: (817) 527-2174 | f: +1 (817) 755-0943

www.trulytitle.com | kami.nichols@trulytitle.com

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Attention: Beware of cyber-crime! If you receive an e-mail or any other communication that appears to be generated from a Truly Title, Inc. employee that contains new, revised or altered bank wire instructions, consider it